REMARKS

Claims 1-12 remain pending in this application. Claims 1, 3, and 5 were amended in this response. No new matter was introduced as a result of the amendments. Support for the amendments may be found, for example, in paragraphs [0041] and [0048-49]. Entry of the amendments and favorable reconsideration is respectfully requested.

Claims 1-3 and 5-7 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Andrews et al.* (US Patent 6,900,762). Claims 4 and 8-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Andrews et al.* (US Patent 6,900,762) in view of *Yoshioka* (US Patent 6,633,763). In light of the present amendments and arguments provided below, Applicants respectfully traverse this rejection.

Specifically, *Andrews* does not disclose a method and system for mapping locations of wireless transmitters having associated transmitter representative data and positioned for detecting the presence of processing exposure of one or more market research participants in market research for a market research area, comprising the features of "storing data in a portable device representing locations within the market research area; inputting transmitter location data in the portable device representing selected locations of the wireless transmitters relative to the market research area; and associating transmitter representative data with respective transmitter location data in the portable device to produce data that maps the locations of the wireless transmitters with the associated transmitter representative data, wherein said transmitter representative data comprises information regarding at least a part of the exposure of the one or more market research participants to one or more commercial items in the market research area" as recited in claim 1, and similarly recited in claims 3 and 5

Regarding *Andrews*, the reference teaches a system and method for locating cell phones within a building, particularly in cases of an emergency (see Abstract, col. 1, lines 16-23). *Andrews* clearly teaches that the process of establishing the location of transmitters, a cell phone, and producing the respective mapping, requires three separate devices: a portable device (116), a cell phone (106), and a location server (112) (FIG. 1). The portable device (116) is initially used during a "walk-though" (typically done "once per year" - see col. 2, lines 5-9) to establish transmitter locations and transmits them to a location server (112) (col. 3, lines 15-23, 27-29; col. 4, lines 31-33). Once the locations are received by the location server, the server maps the

locations of each transmitter (col. 3, lines 28-30). In order to provide location data to the cell phone, the map must always be resident in the location server (col. 3, lines 15-16, 28-30, 39; col. 8, lines 16-18, 53).

Under one embodiment, the location of a cell phone (106) in *Andrews* is determined by transmitting power from each tag in respective time slots (col. 3, lines 50-52). Once the phone (106) receives the signal in a respective slot, the cell phone records the received power and forwards the information to the location server (112), where the server compares mapped power values to establish a location vector (col. 4, lines 24-41). In other embodiments, the transmitting tags broadcast specific information to distinguish each tag, or transmit signals with information specifically identifying their locations (col. 5, lines 46-50)

In the embodiment of FIG. 3, various transmitting tags having distinctive characteristics ("A" - "D") are interspersed in a building to make it "unlikely that any individual tag will be able to provide sufficient information to identify its location if there are more than a few tags . . . dispersed throughout the floor" (col. 8, lines 6-12). Accordingly, when a cell phone (310) travels through a building, each tag characteristic ("A" - "D") is stored in the phone as individual tags are passed to create a kind of "trail" to determine the path which the user has traveled (col. 8, lines 22-33). When an emergency call is made, the cell phone forwards the path sequence (e.g., ABDACAB) to the server, and the server searches for possible paths through a building that would reproduce the received sequence to arrive at a location (col. 8, lines37-44).

In each of these embodiments, *Andrews* does not teach "storing data in a portable device representing locations within the market research area" and/or "inputting transmitter location data in the portable device representing selected locations of the wireless transmitters relative to the market research area" as presently claimed. As discussed above, a separate device (116) is required to input transmitter location data, in order to allow a cell phone to later store data representing tag locations. Thus the same device would never perform the steps of (a) storing data representing locations within the market research area and (b) input transmitter location data representing selected locations.

Furthermore, *Andrews*, does not teach "associating transmitter representative data with respective transmitter location data in the portable device to produce data that maps the locations of the wireless transmitters with the associated transmitter representative data." As discussed
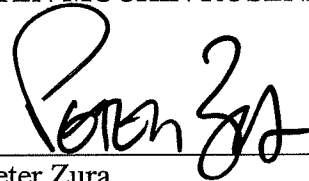
above, a location server performs the mapping. Additionally, *Andrews* is silent with regard to mapping transmitter representative data to location data, where "the transmitter representative data comprises information regarding at least a part of the exposure of the one or more market research participants to one or more commercial items in the market research area."

For at least these reasons, the Applicants submit that the rejection under 35 U.S.C. §102 is overcome and should be withdrawn. As the rejection under 35 U.S.C. §102 is traversed, the rejection of the dependent claims under 35 U.S.C. §103 is traversed as well. An early Notice of Allowance is earnestly requested. If any fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 501214. If such a deduction is made, please indicate the attorney docket number 339198-0065 (P0123) on the account statement.

Respectfully submitted,

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